

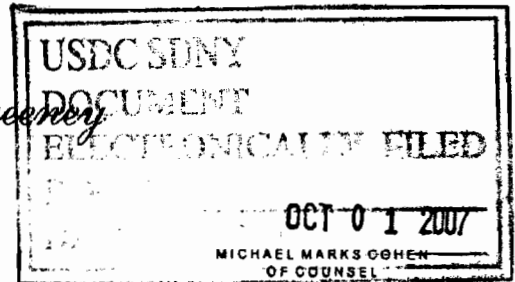
Nicoletti Hornig & Sweeney

WALLSTREET PLAZA
88 PINE STREET
SEVENTH FLOOR
NEW YORK, NY 10005-1801
TELEPHONE 212-220-3830
TELECOPIER 212-220-3780
E-MAIL: general@nicolettihornig.com
WEBSITE: www.nicolettihornig.com

JOHN A.V. NICOLETTI
JAMES F. SWEENEY
DAVID R. HORNIG
FRANK M. MARCIGLIANO
MICHAEL J. CARCICH
ROBERT A. NOVAK
THOMAS M. RITTWEGER
BARBARA A. SHEEHAN
TERRY L. STOLTZ
NOOSHIN NAMAZI

SAMUEL G. COLUZZI
LAWRENCE C. GLYNN
VAL WAMSER
EDWARD L. DOHERTY
KEVIN J. O'MALLEY
GUERRIC RUSSELL
WILLIAM M. PENNELL
MICHAEL J. LARSON
SCOTT D. CLAUSEN
JANA SPERRY

* ALSO ADMITTED IN TEXAS
* ALSO ADMITTED IN NEW JERSEY
* ALSO ADMITTED IN CONNECTICUT
* ALSO ADMITTED IN NORTH CAROLINA



NEW JERSEY OFFICE
401 CONTINENTAL PLAZA
HACKENSACK, NEW JERSEY 07601
TELEPHONE 201-343-0970
TELECOPIER 201-343-5882

September 28, 2007

(Facsimile Transmission - 2 Pages)

Writer's direct dial: 212-220-3839
Direct e-mail: lglynn@nicolettihornig.com

MEMO ENDORSED

IT IS ORDERED that counsel to whom this Memo Endorsement is sent is responsible for faxing or otherwise delivering promptly a copy to all counsel and unrepresented parties and filing a certificate of such service within 5 days from the date hereof. Do not fax such certification to Chambers.

VIA FACSIMILE (212) 805-0426
Honorable Laura Taylor Swain
United States District Court
Southern District of New York
500 Pearl Street
Mail Room 870
New York, New York 10007

Re: **Macsteel International USA Corp. v. M/V UBC Savannah, et al.**
New York Case No.: 07 Civ. 6152 (LTS)
Our Reference No.: 12000119

Dear Judge Swain:

We represent the plaintiff, Macsteel International USA Corp., in the above referenced matter. This action is currently scheduled for an initial pretrial conference for Friday, October 12, 2007 at 3:00 p.m. before Your Honor. We join in the request of defendant Groupero Shipping Co. Ltd. ("Groupero") for an adjournment of the initial pretrial conference. The reason for this request is that the co-defendant, Galborg PTE Ltd. ("Galborg") has yet to appear in the action having failed to acknowledge receipt of the lawsuit and waive service in accordance with Fed. R. Civ. P. 4(d). As a result, it has become necessary for our firm to serve Galborg pursuant to the Hague Convention.

Further, we respectfully request a 120 day extension of time to serve Galborg pursuant to Rule 4(m). The undersigned will take steps to promptly serve this defendant in accordance with Fed. R. Civ. P. 4(m) and the Hague Convention.

Hon. Laura Taylor Swain
September 28, 2007
page 2

Once Galborg has been served and appears in the action, the parties shall promptly conduct a Rule 26(f) conference and will timely prepare and submit a proposed Preliminary Pretrial Statement in accordance with Your Honor's rules.

This is the first such request for the relief sought.

Your Honor's attention in this regard is greatly appreciated.

Respectfully yours,

NICOLETTI HORNIG & SWEENEY

By:


Lawrence C. Glynn

LCG/

cc: Brian S. Tretter, Esq.
Blank Rome LLP
405 Lexington Avenue
New York, New York 10174
Via Facsimile (917) 332-3841

The conference is further
adjourned to
December 14, 2007 at
2:30 pm. The requested
extension of time to
effect service is granted.

SO ORDERED.


9/28/2007
LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE